



Gap Resolution Report

Project Name: Bakun HEP

Installed Capacity: 2520 MW

Country: Malaysia



Project Sponsor: Sarawak Energy

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Report Date: 28 February 2025



Cover page photo: Overview of Bakun HEP, photo taken in 2014. Source: Bakun

Assessment overview	<p>The Bakun Hydroelectric Project (Bakun HEP) underwent an assessment in July 2024 using the Hydropower Sustainability Standard (HSS). The assessment identified a total of 19 significant gaps against the Minimum Requirements of HSS.</p> <p>Sarawak Energy and Bakun HEP has worked to address these gaps since the draft assessment report was delivered on 2nd August 2024, using the designated timeframe available to address gaps under the HS Assurance System.</p> <p>This report presents the Accredited Lead Assessor’s assessment of whether the gaps have been closed, conducted immediately following the designated timeframe in February 2025. Findings are presented below according to the actions and indicators of achievement set out in the August 2024 assessment report.</p> <p>This shows that all gaps have been closed. The final assessment report has been revised, with a recommendation of Silver certification.</p>
Purpose of Gap Resolution Report	<p>In accordance with the HS Assurance System, the Gap Resolution Report documents the resolution of gaps identified during the on-site assessment. Project Proponents have eight months to implement the Minimum Requirements Action Plan and close all gaps. If unresolved, a new assessment is required. If resolved, the Accredited Assessor verifies the corrective actions and submits the revised Preliminary Assessment Report and Gap Resolution Report to the HS Secretariat within ten months of the on-site assessment.</p> <p>The HS Secretariat processes the reports and supporting evidence, initiating the public comment period within 12 months of the on-site assessment. The Gap Resolution Report is published online alongside the Initial Assessment Report, after which Project Proponents may apply for HS certification.</p> <p>This report represents compliance with Section 3.4 of the HS Assurance System.</p>
Revised assessment report	<p>The revised assessment report can be found on the HSA website www.hs-alliance.org. This gap resolution report will be published online alongside the revised assessment report.</p>
Layout of Gap Resolution Report	<p>The Gap Resolution Report provides a comprehensive summary of the significant gaps identified during the July 2024 assessment, the corrective actions undertaken by the Project Proponent, and the Accredited Lead Assessor’s evaluation of whether these gaps have been effectively resolved.</p>

Gap Resolution Findings

Environmental and Social Action Plan, August 2024					Gap Resolution Assessment, February 2025	
Section	Significant gaps	Action(s)	Responsibility	Indicator of achievement	Findings	Met?
1.	Bakun HEP does not have sufficient implementation capacity for social and wider environmental issues, resulting in delayed and poorly planned commitments and non-conformances with SEB PPG.	(1) Increase plant-level environmental and social (E&S) staffing especially for social aspects and community liaison.	HSSE (Env) CSRSM	New organization chart and job descriptions for CSRSM approved by HR; staff recruited and in station at Bakun HEP; training records on social aspects; interview with CSRSM.	<ul style="list-style-type: none"> Updated CSRSM organization chart indicates 2 additional staff (Snr Executive and Executive) to be appointed to Bakun HEP (recruitment process underway, February 2025; prior to moving to Baleh HEP when it is operational), and 2 consultants allocated to Bakun HEP on 24-month fixed contracts (in place); Three biodiversity experts (aquatic ecologist, wildlife ecologist, botanist) appointed on 24-month fixed term contracts addressing Bakun and Murum HEPs; Training records since August 2024 indicate training in social impact assessment, ISO 26000, and negotiation for CSRSM staff and others; Interview with CSRSM (05.02.25) indicated strong management support for new capacity, high interest in the new positions, and that new recruits are expected to be from downstream communities. 	✓
		(2) Fully establish Bakun ESG meetings, with rigorous ESG quarterly reports, and attention to social analysis.	SUSTESG	Approved TOR, agenda and quarterly reporting template; records of quarterly ESG meetings.	<ul style="list-style-type: none"> Evidence provided of TOR, quarterly meetings minutes (Q3, Q4 2024), and dashboard presented to Q4 meeting; Dashboard and minutes show detail for environment, HSE, CSR, grievances etc, with detail for social aspects. 	✓
		(3) Expedite key studies and plans, with time bound implementation commitments (biodiversity, downstream flows).	SUSTESG	Documentary evidence of completed or significantly advanced studies; study progress reports (approximately prior to the gap resolution assessment / February 2025).	<ul style="list-style-type: none"> Significant progress has been made with biodiversity (see 13. below); A competitive tender process for the Downstream Flows and Water Quality Study was cancelled due to excessive pricing, and direct negotiation opened, with contract award expected in March 2025 (in February 2025, a preferred firm has been selected by Direct Negotiation); Overall, implementation of specialist studies remains painfully slow. 	✓

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		(4) Instigate Management Review processes for all E&S plans.	SUSTESG	Management Review processes documented in updated plans; evidence of Management Review processes in minutes of meetings / performance reports.	<ul style="list-style-type: none"> The Bakun HEP EMP includes an updated section describing Management Review, i.e. the range of departmental and quarterly meetings, including ESG and EOSH meetings in which environmental performance is discussed/escalated; The updated CMP includes a similar description of the range of meetings for review; Amendment history on the range of SEB plans indicates regular review and updates. 	✓
2.	There is no evidence that the Bakun HEP transmission line is within the scope of SEB's HSE Management System or Bakun's environmental and social plans.	(1) Clarify inclusion of transmission line in HSE Management System.	HSSE (Env)	Documented environmental risk evaluation and revised transmission line environmental procedures.	<ul style="list-style-type: none"> HSSE risk assessment prepared in December 2024; A separate EMP for transmission line operation has been prepared (December 2024), including responsibilities, measures for air quality, waste, erosion control, and emergency response, and management review; Work instructions for line and slope inspections include reference to safety requirements, but inspection forms do not include reporting on occupational safety; 1 example of a permit to work on transmission line maintenance was provided; Documentation provided on the establishment of EOSH Committee for the transmission line. 	✓
		(2) Extend EMP, CMP and other plans to include the transmission line.	KIV	Documentary evidence of application of HSE management, environmental, community, and stakeholder management to the transmission line.	<ul style="list-style-type: none"> Bakun HEP EMP now includes reference to the Bakun HEP transmission line, in relation to waste management; CMP includes mention of land for transmission towers as a concern of some communities; SMP includes transmission line as an area of interest for 4 stakeholder groups in the stakeholder analysis, but nothing more. 	✓
3.	A range of negative social impacts and impacts on the wider environment are ongoing.	As above and below (actions for gaps 1, 4, 7-12, 13, 14, and 19).		Refer to the corresponding gaps.		✓
4.	The prolonged absence of measures to address low dissolved oxygen (DO) in releases from Bakun Dam.	(1) Show that the training logs are fixed and serving their purpose.	Bakun HEP (Maintenance)	Reports of completion of works including tests of crane operations; video footage of the training logs being raised to their full extent and lowered.	<ul style="list-style-type: none"> Repair of crane completed October 2024; Installation of all gates completed November 2024; Video evidence of gantry moving and crane operating at 1 unit was provided; 	✓

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		(2) Show progress on the SMARt project.	R&D	Workplan showing tasks, dates, and indicators; progress reports; documented designs, modelling, drawings; photo/ video evidence of field assessments and works; interviews with R&D to demonstrate progress.	<ul style="list-style-type: none"> Records of water levels and number of logs in place at each unit show increase to the required number of logs in November 2024. SMARt tasks, budget, and schedule are set out in GCOO (Group Chief Operating Officer) and RIMT (Research and Innovation Management Team) papers from May 2024; Contract for first pilot unit awarded in November 2024; award paper includes workplan; Design of 1 unit is completed; procurement of major components is underway; manufacture is 70% or more complete, except for the aeration system (20%); Progress is tracked through weekly progress updates; Currently in fine-tuning / workshop testing phase, will be installed downstream of the dam in Q3 2024, pilot testing until October, analysis of outcome by December 2025, 2 units planned by Q4 2026; Interview (07.02.24) indicated that theoretically 40 units will be required to pump the volume of air required to raise DO to the required standard. 	✓
5.	Bakun HEP did not develop the DSEP in conjunction with other agencies in the government responsible for emergency preparedness and response management.	Provide the updated DSEP showing involvement of all relevant agencies in the area responsible for disaster and emergency response management.	DSU	Updated DSEP incorporating: Dam Safety Review comments; mapping of key agencies with responsibilities; engagement with these agencies, their views, and explanation of how DSEP has responded to their views.	Version 2.0 of DSEP has several updates including lists of agencies to be notified during Dam Safety Agency of varying levels, responsibilities of the Disaster Management Committee (DMC), and external contacts.	✓
6.	Bakun HEP has not shared controlled copies of DSEP with those responsible for emergency management in the communities, which is a major non-conformance with MyDAMS requirements.	Distribute controlled copies of the updated DSEP to all agencies responsible for disaster and emergency response management.	DSU	Evidence of distribution of controlled copies to key agencies, and documentation of receipt by those agencies; interview testimony of key agencies.	<ul style="list-style-type: none"> Documentary evidence of distribution of DSEP to Kapit RO and Belaga DO in January 2025; Further engagement on the updated DSEP with Belaga DO took place in February 2025, and engagement with a range of external agencies is planned in 2025 (Kapit RO, Betong, Kanowit and Song DOs, and safety awareness with communities (set out in an Emergency Preparedness Schedule); SEB has requested that Kapit Resident (as chairman of the Kapit Division Disaster Management Committee) and Belaga District Officer (chairperson of Belaga District DMC) 	✓

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					<p>conduct controlled distribution of the DSEP to the other agencies in their DMCs;</p> <ul style="list-style-type: none"> Controlled copies will be distributed to the remaining Residents and District Officers in the Sibuh and Sarikei divisions by March 2025, and engagement with the Divisions DMC will follow in Q2 2025. 	
7.	There is no Bakun-specific analysis of Indigenous Peoples' rights affected, including the legacy of resettlement and undelivered commitments.	(1) Bakun-specific assessment of Indigenous Peoples' rights including how they are affected by the legacy of resettlement, using external social expertise.	SUSTESG SUST	Documented Bakun-specific analysis of Indigenous Peoples' rights, relating rights identified in the Corporate Paper to Bakun-affected communities and how those rights have been and are affected by Bakun, with details for each longhouse; interview testimony of consultants and personnel involved.	<ul style="list-style-type: none"> SEB has contracted a consulting firm to prepare an Indigenous Peoples' Plan (IPP) which will include analysis of Indigenous Peoples' rights, relating to Bakun-affected communities and how those rights have been and are affected by Bakun, with details for each longhouse; The consultants were awarded the contract in December 2024, delivered an Inception Report in January 2025, and will deliver Interim Reports on groups of communities, and the IPP in July 2025. 	✓
		(2) Ensure assessment of access to services for upstream communities and impacts on downstream fisheries livelihoods are included.	SUSTESG SUST	Documented Bakun-specific analysis of Indigenous Peoples' rights includes access to services for upstream communities and impacts on downstream fisheries livelihoods.	The Inception Report explicitly identifies these in its objectives for the impact assessment and analysis.	✓
8.	Bakun HEP has not identified SEB corporate objectives related to Indigenous Peoples' rights that it must conform with.	Include identification of SEB corporate objectives related to Indigenous Peoples' rights in the above assessment, and below Management Plan.	SUSTESG SUST	Documented Bakun-specific analysis of Indigenous Peoples' rights includes clear identification of SEB corporate objectives and PPG requirements related to Indigenous Peoples' rights that Bakun HEP must conform with.	<ul style="list-style-type: none"> The Scope of Work for IPP preparation and the consultant's Inception Report does not refer to analysis of which SEB corporate objectives relate to IP rights; However, interview with the consultants (07.02.25) indicates that they will include this analysis in the policy and legal section of the IPP. 	✓
9.	There is no systematic monitoring of commitments and the effectiveness of measures taken by all agencies' to address resettles' and Indigenous Peoples' rights (District Office and other government agencies, as well as SEB), and no monitoring of commitments	(1) Establish longhouse-by-longhouse system of tracking commitments and the effectiveness of management measures.	SUSTESG CSRSM	Documentary evidence of extension of monitoring to include all other agencies' (e.g. Belaga DO) commitments; include key commitments made in the past (identified in Master plan Study; include completed and unresolved); documentary evidence of strengthened, regularly updated CMP Monitoring Book, including effectiveness and outcomes.	<p>Strengthened CMP Monitoring Book provided, showing:</p> <ul style="list-style-type: none"> Improved planning (Management Measures, Objectives, Initiatives, Proposed Plan of Action , Indicators, Collaborators, Budget) for groups of communities; Action log with target dates and outcomes; Requests log with columns to identify the requesting longhouse, and track whether open or closed. 	✓
		(2) Extend the Grievance Register Log to include	SUSTESG CSRSM	Documentary evidence of improved Grievance Log, including indication of the complainant's	Improved Grievance Log includes columns whether the grievance concerns the legacy of resettlement,	✓

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	to host communities (even by SEB).	indication of the complainant's longhouse and whether the grievance concerns the legacy of resettlement and Indigenous Peoples' rights.		longhouse and whether the grievance concerns the legacy of resettlement and Indigenous Peoples' rights.	and the type of Indigenous Peoples' rights affected. It does not include the complainant's longhouse, but does include whether they are from an upstream, downstream, BRS, or host community.	
		(3) Ensure host communities are included in these systems.	SUSTESG CSRSM	Documentary evidence of host communities' inclusion in strengthened CMP Monitoring Book.	Log of requests and whether open/closed included in CMP Monitoring Book includes a number of requests from host communities, as indicated in a column on the origin of requestors.	✓
10.	Measures are not in place to address all identified Bakun Indigenous Peoples' rights affected.	(1) Prepare a long-term Management Plan, including all affected communities, to address all affected livelihoods and living standards, and Indigenous Peoples' rights with the aim of reconciliation.	SUSTESG SUST	Documented Management Plan(s) that address all affected communities; interview testimony of consultants and personnel involved, and of BCMSC chair.	<ul style="list-style-type: none"> SEB has contracted a consulting firm to prepare an Indigenous Peoples' Plan (IPP), which will be delivered by July 2025 (see above), including assessment of impacts on livelihoods and living standards; Interview with the consultants (07.02.25) confirms this. 	✓
		(2) Obtain formal agreement of other agencies to their role in this Plan.	SUSTESG SUST	Documented Engagement Plan for the analysis of Indigenous Peoples' rights; documented agreement of other agencies (e.g. Belaga DO) regarding their role in the Management Plan(s).	The inception report of the consultants preparing the IPP includes an engagement plan.	✓
		(3) Link the plan to the EPU commitments under its Master Plan 2050.	SUSTESG SUST	Documented section within the Management Plan(s) on related EPU commitments in the Master Plan 2050.	Interview with the consultants (07.02.25) indicates that they will take the EPU Master Plan commitments into account. It is now in draft and under consideration by EPU.	✓
		(4) Include monitoring parameters and exit strategies in this plan.	SUSTESG SUST	Documented sections within the Management Plan(s) on monitoring, including indicators of effectiveness and outcomes, and exit strategies.	The scope of work of the consultants preparing the IPP includes monitoring and evaluation.	✓
		(5) Incorporate reference to the Management Plan in the MoU with the Bakun Community Management Steering Committee, and in the BRS-Sarawak Government agreement proposed by the Master Plan 2050.	SUSTESG CSRSM	BCMSC MoU and the BRS-Sarawak Government agreement proposed by the Master Plan 2050 both show reference to the Management Plan(s).	<ul style="list-style-type: none"> A BRS-Sarawak Government agreement, as expected to be proposed by the EPU Master Plan (at the time of the assessment in July 2024), is not now planned; The BCMSC MoU does not include reference to the IPP, but it does include reference to responsibilities such as 'Identify and prioritize community-driven projects and initiatives', 'Collaborate in providing a platform for issues resolution' etc. 	✓

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		(6) Ensure free, prior and informed participation in the development of the MoU and this agreement.	SUSTESG SUST	Documented evidence of the participation of all communities in the development of the MoU and this agreement; interview testimony of a selection of BCMSC members.	Interviews indicate that BCMSC members have received the MoU and are currently (February 2025) reviewing it.	✓
		(7) Publicly disclose this Management Plan and the MoU on the Bakun HEP website.	SUSTESG SUST	Continuing disclosure of the Management Plan and MoU on the Bakun HEP website.	At the time of this Gap Resolution assessment, the following were available on the Bakun HEP webpage: <ul style="list-style-type: none"> • A description of the BCMSC, its terms of reference, and how the MoU is under development; • A statement “To learn more, access the MoU on the establishment of the BCMSC here” which will be updated with the link to the MoU when it is finalized; • A description of the scope of work of the IPP; and • A link to the Inception Report of the IPP study. 	✓
11.	Livelihoods and living standards have not been restored or improved among key, significant groups of affected households, and there are non-conformances with SEB social PPG.	As above (actions for gap 10.) and ensure assessment of access to services for upstream communities and impacts on downstream fisheries livelihoods are included in the actions for gap 7 above.		Refer to gaps 7 and 10.	The Scope of Work for IPP preparation included reference to the issues of access to services for upstream communities and impacts on downstream fisheries livelihoods.	✓
12.	Bakun HEP impacts on Indigenous Peoples’ rights, including legacy impacts, are not mitigated or compensated.	As above (actions for gaps 7-11).		Refer to gaps 7 to 11.		✓
13.	There is insufficient evidence to show that measures are in place to manage identified biodiversity issues.	For biodiversity management actions, show committed responsibilities, funding and resources, and evidence that some are making progress.	SUSTESG R&D EIA (BMP)	Biodiversity staff recruited and in station at Bakun HEP; updated Biodiversity Management Plan showing responsibilities, funding, and resources; progress report (approximately prior to the gap resolution assessment beginning February 2025) including next steps; interview testimony with Bakun HEP biodiversity personnel.	<ul style="list-style-type: none"> • Three additional biodiversity experts (aquatic ecologist, wildlife ecologist, botanist) appointed on 24-month fixed term contracts addressing Bakun and Murum HEPs, and 1 further wildlife ecologist to be appointed, all based at Bakun; • Biodiversity Management Plan (BMP) amendment history form shows numerous updates made in October 2024; • BMP updates include: a section on Roles and Responsibilities, with organogram and table on responsibilities of a Biodiversity Conservation Committee, Bakun HEP Station Manager, Sustainability / ESG HQ staff, 4 biodiversity 	✓

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					<p>experts, and the R&D and HSSE corporate teams; and a brief description of the budget required for a temporary freshwater fish hatchery and plant nursery and Biodiversity Monitoring and Evaluation Plan (BMEP);</p> <ul style="list-style-type: none"> • The proposed Centre of Excellence for Biodiversity and Environmental Research is now included in the BMP; • Evidence was also provided of the tender documents for Engineering, Procurement, Construction and Commissioning of the Floating Laboratory, with the tender process underway in February 2025; the floating lab will allow monitoring and patrols to be extended upstream; • Interview (06.02.25) with new biodiversity experts and R&D biodiversity lead described details of actions on BMEP, research approvals, floating lab, hatchery/nursery, rehabilitation of reservoir shoreline, prevention of illegal wildlife trade and community awareness, and action plans for endemics. 	
14.	Measures to address the emerging grave site and the museum opportunity have not been taken on a timely basis.	(1) Take urgent action in the next quarter to address the emerging grave sites, in partnership with Sarawak Museum.	CSRSM	Bakun HEP-approved plan; photo and video evidence of completion and of ceremonial activities, if culturally appropriate; interview testimony of affected headmen/ headwomen and Museum.	<ul style="list-style-type: none"> • Site visits undertaken to 4 grave locations (some previously relocated, some on reservoir shoreline) in September 2024, with respective headmen, JKKKs, District Office, and Sarawak Museum; • Sarawak Museum has delivered a report on the claims, including detailed claims and budgets, with recommendations; • SEB sought internal approval for release of funds to address all issues, including improvements in cemeteries, burial of remains etc, and funds were released in December 2024; • Interviews confirm site visits and Sarawak Museum report, and community leaders are expecting the works to start in March 2025, with appropriate customary rituals; • Legal agreement for the works, between Government of Sarawak and SEB, has been drafted. 	✓

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		(2) Demonstrate progress in establishing the Museum.	CSRSM	Documentary evidence of progress (proposal, signed agreement, project monitoring report); photo evidence of works; interview testimony of partners (BLNA and/or Sarawak Museum).	<ul style="list-style-type: none"> The proposal has been developed further into a cultural and commercial centre, consisting of (ground floor) shop/kiosk for local vendors to trade their local products, and (first and second floor) homestay, meeting room, conference room, business incubator, and museum; Progress is demonstrated, through internal memo of site visit, architect's conceptual drawings and budget for the centre; GEC paper requesting SEB to finance RM 3 million of the RM 10.4 million budget (approved 30 December 2024; the remaining will be sought from State and Federal Government); minutes of a meeting between SEB and BLNA in January 2025 to discuss the project; It is too early for photo evidence of works; Interviews with partners confirmed the above. 	✓
15.	The effectiveness of stakeholder engagement is not monitored.	Systematically incorporate engagement activities/metrics and grievance metrics in quarterly reports and quarterly Bakun ESG meetings.	SUSTESG	Documented quarterly reports and minutes of quarterly ESG meetings show metrics on engagement activities and grievances.	<ul style="list-style-type: none"> ESG Dashboard Q4 2024 shows total grievances raised, numbers open/closed, and categorization by type, as well as data on community engagement (numbers of engagement meeting, categorized by upstream/downstream etc, numbers of requests raised, commitments made, events, and engagement meetings with leaders); Minutes of ESG quarterly meetings (Q3, Q4 2024) show discussion of grievances, and CSRSM activities, including engagement and community requests. 	✓
16.	Engagement with upstream and downstream communities has been limited and infrequent, and engagement with host communities to-date has been limited.	(1) Ensure that engagement with upstream and downstream communities is regular and more frequent, and that meetings are conducted in their communities.	CSRSM	Monthly Engagement Reports show increased frequency of engagement with upstream and downstream communities, and meetings held in their communities; photo evidence of meetings.	<ul style="list-style-type: none"> Photo evidence provided of recent engagement meetings held in 15 communities (mainly downstream and upstream, as far upstream as Long Busang); Community Engagement workplan for 2025 shows planned engagement meetings each month, with meetings at least in one upstream and at least two downstream longhouses each month; Community Engagement workplan for 2025 shows past engagement, including 6 downstream communities, 3 upstream, 3 BRS, and 2 host communities since the HSS assessment, up to February 2025; 	✓

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					<ul style="list-style-type: none"> Bakun HEP still should do more to ensure upstream communities are fully involved in BCMSC. 	
		(2) Systematically extend engagement to host communities, incorporating them in the SMP and CMP.	CSRSM	Revised plans and Monthly Engagement Reports show engagement with host communities, and meetings held in their communities; photo evidence of meetings.	<ul style="list-style-type: none"> Host communities were added to SMP in September 2024; Community Engagement workplan for 2025 shows engagement with 2 host communities since the HSS assessment, up to February 2025. Photo and video evidence provided of recent engagement meetings includes meetings at host communities; Reports provided for meetings held in 2 downstream, 2 resettled, and 4 host communities in November 2024 and January 2025 (all other reports are April 2024); Engagement workplan for 2025 shows planned engagement meetings in at least 1 host community each month. 	✓
		(3) Include host communities in the above assessment of rights and longhouse monitoring (action for gaps 9 and 10).		Refer to gaps 9 and 10.		✓
17.	The Grievance Mechanism (GM) is not in place in all affected communities and is not yet being used to report and resolve all grievances, and this is also a major non-conformance.	(1) Ensure the GM is rolled out to all communities.	CSRSM SUSTESG	Interview testimony of selection of longhouse headmen/headwomen and of CSR Senior Executive and Clerk(s); photo evidence of newly-established, weather-proof GM notices for all longhouses.	<ul style="list-style-type: none"> Interviews indicate that community members are aware of the GM; some community prefer to use face-to-face engagement meetings rather than online channels, and this is still an option; Photo-evidence is provided for 15 BRS longhouses, 21 downstream, and 5 host community longhouses, showing A3, weather-proof posters of the GM mechanism and suggested areas of interest; Photo-evidence not provided for upstream communities; the new posters have been provided to headmen for them to post. 	✓
		(2) Ensure GM notices are permanently established (e.g. with weather-proofing).	CSRSM	Photo evidence of newly-established, weather-proof GM notices for all longhouses.	Photo-evidence is provided for 15 BRS longhouses, 21 downstream, and 5 host community longhouses, showing large, weather-proof posters of the GM mechanism and suggested areas of interest.	✓
		(3) Distinguish grievances from requests in the grievance log, add missing	CSRSM SUSTESG	Documented updated grievance log.	<ul style="list-style-type: none"> Grievance log has been updated, and additional columns include: whether it is a request or grievance; the channel of receipt; if it related to 	✓

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		grievances, and avoid overlap with commitments register.			<p>Indigenous People's rights, or to the legacy of resettlement; dates for receipt, resolution, and acknowledgement by complainant.</p> <p>The log could be improved further by including a column for the complainant's longhouse, and distinguishing between the date the solution was agreed, from the date the solution was completed/implemented.</p>	
		(4) Adjust target response / resolution intervals.	CSRSM SUSTESG	Updated grievance procedure; interview testimony with CSR Senior Executive and Clerk(s).	<ul style="list-style-type: none"> The Stakeholder Management Plan was updated in September 2024, with updated target response / resolution intervals in the grievance procedure timeline/flowchart provided in the section on Grievance Management. Interview with CSRSM personnel (05.02.25), including the administrator of Grievance Management, concerned the new grievance log and updated intervals. 	✓
18.	No significant project reports are made publicly available.	Make project reports available on the Bakun website, starting with the EMP and CMP, and moving towards quarterly EOSH or ESG reports.	SUSTESG	Continuing disclosure of EMP, CMP, and quarterly EOSH or ESG reports, on Bakun HEP website.	<p>https://www.sarawakenergy.com/bakun-hydroelectric-plant - accessed February 2025 shows:</p> <ul style="list-style-type: none"> Performance from October 2024 ((OHS, environmental, grievances, community engagement, employment); Link to an 8-page Executive Summary of the EMP; Link to a 16-page Executive Summary of the CMP; Link to the inception report for the preparation of the Indigenous Peoples Plan (not working); Additional detail on the webpages on performance, environmental and social performance, controlled releases, water quality, CSR, R&D etc. <p>Further steps can be taken to ensure that a range of reports (not only executive summaries), including project progress reports, are easily accessible (e.g. on 1 page listing them), and regularly updated.</p>	✓
19.	There is no established and sustained programme for the removal of floating logs in the reservoir beyond a 15 km radius from Bakun Dam,	(1) Set out a scaled-up, long-term solution for the removal of logs, prioritizing zones for	Water Management DSU CSRSM	Mapping of routes/areas prioritised for navigation and community access; evidence of engagement with reservoir communities on these priorities; management plan for ongoing log removal from identified reservoir zones,	<ul style="list-style-type: none"> Strengthened debris management actions, including inspections beyond the 15 km radius, now included in Reservoir Management Plan; RMP sections on debris management and biomass removal include detailed tasks, 	✓

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	presenting serious navigational constraints and safety hazards to the communities living upstream.	navigation and community access.		including methods, resources, disposal, safety, timeframe, responsibilities, and metrics of success.	categories of severity, methods, zonation, reporting etc; <ul style="list-style-type: none"> September 2024 inspection to identify areas of greatest concern; Monthly inspections, with varying geographical focus; Community engagement meetings in 2 main reservoir shoreline communities, and whatsapp group set up for headmen to report debris-related issues; Community action (<i>gotong-royong</i>) to remove log debris planned with one community in mid-February 2025. 	
		(2) Demonstrate implementation of this solution.	Water Management DSU	Contract strategy paper; documentary evidence of procurement, mobilisation, and works of appointed contractor(s); photo or video evidence of works; interview testimony with Water Management and DSU, reservoir longhouse headmen/ headwomen.	<ul style="list-style-type: none"> Renewed annual contract for removal of floating debris, including areas beyond 15 km, tender January 2025, with award expected by June 2025; The new contract will include barricade, and removal works of the floating debris at hot spot zones up to Long Kebuho; Key action is to collect and barricade the floating debris/logs at designated log ponds, and will include disposal; Approved Contract Strategy document (December 2024) includes detailed tasks and requirements (methods etc); Photo evidence of gathering of logs under current contract provided; Interviews confirm above. 	✓